

Exhibit A

Claire Brunken

HIGHLY CONFIDENTIAL
New York, NY

July 22, 2005

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1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS
3 CIVIL ACTION: 01-CV-12257-PBS
4 MDL NO. 1456

5 -----)
6 IN RE PHARMACEUTICAL INDUSTRY)
7 AVERAGE WHOLESALE PRICE)
8 LITIGATION)
9 -----)
10 THIS DOCUMENT RELATES TO ALL CLASS ACTIONS)
11 -----)

12 Friday, July 22, 2005

13 9:05 a.m.

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HIGHLY CONFIDENTIAL EXAMINATION BEFORE
TRIAL of CLAIRE BRUNKEN, taken by the Class-Action
Plaintiffs before Danielle Grant, a Certified
Shorthand (Stenotype) Reporter and Notary Public
within and for the State of New York.

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1 always done with all other customers, which was as
2 a percentage off of WAC.

3 Q At RPR was there a standard
4 relationship between the WAC and AWP for these
5 various drugs?

6 A I believe it varied.

7 Q What was the range on which it varied?

8 A Twenty to 25 percent.

9 Q Some drugs the AWP was WAC plus 20 and
10 others it was WAC plus 25?

11 A Right.

12 Q How about at Aventis, same question,
13 was there some standard relationship?

14 A I don't know.

15 Q Were there any policies at RPR
16 concerning AWP or AWP pricing?

17 A I can only speak for the contract area
18 in that regard.

19 Q Okay. Tell me what you know about the
20 contract area?

21 A Can you rephrase the question?

22 Q Were there any policies in the

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1 WAC, what data would you get in the presentation
2 from the people proposing the price increase?

3 A In general that data would include
4 competitor's pricing, history of competitor's
5 price increases overtime, our own price increases
6 over time.

7 Q Anything else?

8 A Reasons for variances from a standard
9 type price increase.

10 Q I don't understand what you mean
11 standard type price increase.

12 A In general pharmaceutical prices are
13 increased over the course of time, and there may
14 be an effort to try to control price increases to
15 a level, not to exceed the consumer price index.
16 There are a number of pharmaceutical companies who
17 are committed to not increasing their average
18 price over the CPI index.

19 Q Were RPR and Aventis among them?

20 A Yes.

21 Q What timeframe are you talking about
22 for this commitment?